

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

CATHOLIC LEGAL IMMIGRATION  
NETWORK, INC.,

Plaintiff,

v.

UNITED STATES CITIZENSHIP AND  
IMMIGRATION SERVICES,

Defendant.

Case No. 8:19-cv-01511-TDC

**SECOND CONSENT MOTION TO EXTEND TIME TO RESPOND TO  
COMPLAINT**

Defendant, the United States Citizenship and Immigration Services (the “Defendant”), through its counsel, Robert K. Hur, United States Attorney for the District of Maryland, and Alan C. Lazerow, Assistant United States Attorney for that district, submits this *Second Consent Motion to Extend Time to Respond to Complaint* (the “Motion”).

1. On May 22, 2019, Catholic Legal Immigration Network, Inc. (the “Plaintiff”) filed the *Complaint for Declaratory and Injunctive Relief*, *see* ECF No. 1 (the “Complaint”), seeking to compel Defendant to disclose records Plaintiff requested under the Freedom of Information Act, 5 U.S.C. § 522 (“FOIA”).

2. On June 18, 2019, Defendant responded to Plaintiff’s FOIA request and produced responsive documents. Defendant released 824 pages in full, released 453 pages in part, and withheld 132 pages.

3. On June 24, 2019, the Court entered a Paperless Order extending the time for Defendant to respond to the Complaint to July 24, 2019.

4. Defendant requires additional time to respond to the Complaint. Undersigned counsel has conferred with Plaintiff's counsel, and Plaintiff consents to a further extension of fourteen (14) days, *i.e.* through August 7, 2019 (the "Response Deadline"). The parties are in the process of conferring in attempting to narrow the scope of the issues to be brief in summary judgment motions. They will continue to confer during this additional period. The parties contemplate that, by the Response Deadline, they will either (i) propose a summary-judgment briefing schedule, or (ii) if the parties have not been able to narrow the scope of the issues in summary judgment motions, request additional time to so narrow the issues.

5. Michelle S. Grant, Esq., counsel for the Plaintiff, consents to the relief Defendant seeks in the Motion.

WHEREFORE, Defendant requests that the Court grant the Motion and extend the deadline for Defendant to respond to the Complaint through August 7, 2019.

Respectfully submitted,

Robert K. Hur  
United States Attorney

By: \_\_\_\_\_/s/  
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*Counsel for Defendant*

**CERTIFICATE OF SERVICE**

I certify that on this 23rd day of July, 2019, a copy of the *Second Consent Motion to Extend Time to Respond to Complaint* was electronically served on all parties receiving CM/ECF notices in this case.

/s/

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Alan C. Lazerow  
Assistant United States Attorney